

Valli Kane & Vagnini

EMPLOYEE RIGHTS ATTORNEYS

600 Old Country Road
Suite 519
Garden City, NY 11530

Tel: (516) 203-7180
Fax: (516) 706-0248
www.vkvlawyers.com

March 13, 2025

VIA ECF

Hon. Jennifer H. Rearden
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

SO ORDERED:

03/14/2025



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: *Campbell et al. v. The City University of New York*, 1:24-cv-02575 (JHR) (RWL)

**Joint Request for Conditional Certification of Two Collectives and
Approval of Proposed Notice**

Dear Judge Rearden:

On February 13, 2025, Plaintiffs filed an Amended Motion for Conditional Certification of Two Collectives (the “Motion”). *See* Dkt. 79-81. The Motion requested that Defendant be ordered to supply Plaintiffs’ counsel with contact information for all putative collective members within 14 days of Preliminary Approval. Dkt. 81 at 17. The Motion also proposed a Notice and a Reminder Notice to be sent to the purported collective members. Dkt. 80-17, 80-18.

After the Motion was filed, Defendant’s counsel indicated that Defendant would not oppose Plaintiffs’ motion if the parties could agree upon the terms of the Notice and Reminder Notice (the “Notices”). So, the parties engaged in good-faith negotiations regarding the language of the Notices and agreed upon the Notices attached to this letter motion as Exhibits 1 and 2. Defendant’s counsel also requested that Defendant have 30 days to provide the putative collective members’ contact information, instead of 14 days. Plaintiffs’ counsel consented to this request.

Accordingly, the parties jointly request that:

- The Court conditionally certifies the proposed collectives as defined in Docket 81 at 1, 2.
- The Court approve the proposed Notices, attached here as Exhibits 1 and 3. Redlines showing the differences from the previously submitted Notices are attached as Exhibits 2 and 4.

- The Court permit Plaintiffs' counsel to hire Settlement Services, Inc. ("SSI"), a third-party class action administration company, to mail and email the Notices and conduct skip traces if necessary. Plaintiffs' counsel will oversee and pay SSI's fees and costs, subject to reimbursement if Plaintiffs ultimately prevail.
- The Court order Defendant to provide Plaintiffs' counsel within 30 days of Preliminary Approval a computer-readable file with the following information for all putative collective members: names, last known mailing addresses, alternate addresses, all known email addresses (work and personal), and dates of employment for all putative collective members employed since three years before the date the Court grants this motion.

Dated: Garden City, New York

March 13, 2025

Respectfully submitted,

/s/ Robert J. Valli, Jr.

Valli Kane & Vagnini LLP

Robert J. Valli, Jr.

Sara Wyn Kane

Matthew Berman

Brendan Carman

600 Old Country Road, Ste. 519

Garden City, New York 11530

(516) 203-7180 (phone)

(516) 706-0248 (fax)

rvalli@vkv.law

skane@vkv.law

mberman@vkv.law

bcarman@vkv.law

Mehri & Skalet PLLC

Michael D. Lieder (*pro hac vice*)

Jane Kim (*pro hac vice*)

Mehri & Skalet, PLLC

2000 K. Street, NW, Suite 325

Washington, DC 20006

Telephone: (202) 822-5100

Facsimile: (202) 822-4997

mlieder@findjustice.com

jkim@findjustice.com